

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**KEVIN COOK and CABELL GOODMAN, §
PLAINTIFFS, §**

CIVIL ACTION NO. 3:24-cv-00656-MHL

VERSUS §

**ADVON CORPORATION, §
DEFENDANT. §**

DISTRICT JUDGE M. HANNAH LAUCK

DECLARATION WILLIAM GRAHAM

Pursuant to 28 U.S.C. § 1746, I hereby state the following is true and correct to the best of my knowledge.

1. My name is William “Bill” Graham and I am over the age of majority and compete to testify to the following based on my personal knowledge.
2. I am President and Founder of Advon Corporation. I have held the position of President since 2009.
3. I am currently 68 years old.
4. As President of Advon Corporation, I oversee thirty-two (32) employees.
5. As President and Founder of Advon Corporation, my duties and responsibilities include but are not limited to, overseeing all current and pending projects, drafting and reviewing construction bids, assuring all of Advon’s projects adhere to the owner’s specifications, and for all budgeting and forecasting for Advon’s current, pending, and future projects.
6. In January of this year, I fell and suffered an injury which caused me to be hospitalized for thirty-one (31) days.
7. Due to my age and this recent injury my ability to travel long distances and by airplane is limited.
8. Additionally, I have never travelled to Richmond, Virginia for personal nor business related purposes.

I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Executed on this 24 day of June 2025.

A handwritten signature in black ink, appearing to read 'Bill Graham', is written over a horizontal line.

William "Bill" Graham